

Exhibit 15

[Print in black ink all areas in **bold** letters. Other spaces are for Court use.]

At I.A.S. Part 4 of the Supreme Court of the State of New York, held in and for the County of New York at the Courthouse, thereof, 60 Centre Street, New York, N.Y., on the 29 day of June, 2007

PRESENT: HON.

Nancy Banan
Justice of the Supreme Court

Index Number 100871/1D

In the Matter of the Application of

Mariyah Lopez
[fill in name(s)] Petitioner(s)

- against -

NYC Department of Homeless Services

Amended
ORDER TO SHOW CAUSE
WITH T.R.O.
IN SPECIAL PROCEEDING

[fill in name(s)] Respondent(s)

Upon reading and filing the petition(s) of

Mariyah Lopez
[your name(s)], sworn to on June 29th, 2007

[date Verified Petition notarized] and upon the exhibits attached to the petition,

[Identify Exhibits. List additional Exhibits on separate page.]

Exhibit A - Letter from my treating psychiatrist Dr Pierre Arty MD
B - A letter from myself, the petitioner, to the Court
C - DHS denial of termination
D Letter to MR Roberts, from Jennie Casciano, expert
E Letter from Sarah Acker, DA

Let the respondent(s) show cause at I.A.S. Part 4, Room 1127B of this Court, to be held at the Courthouse, 60 Centre Street, New York, N.Y., on the 10 day of

July, 2007 at 11:30 o'clock in the fourth noon or as soon as the parties to

this proceeding may be heard why an order should not be made, providing the following relief:

[briefly describe what you are asking the Court] To order DHS to place me back at Mishka's shelter temporarily until this

Court determines if the City's allegations can be proven
in a hearing where witnesses can testify, OR order DHS
to place me in ~~any~~ or temporary hotel OR other facility where
I can follow the directions of my treatment team.
for the reasons that [briefly describe the reasons why you should be granted what you are
requesting] DHS decision to move me from Marsha's was arbitrary
and Capricious, and I face harm that cannot be addressed
through litigation later if DHS decision(s) concerning my
housing and healthcare. I stand a good chance of proving
that I was NOT a danger to a majority of Marsha's staff or
clients, and that ALL parties who submitted affidavits in support
of my transfer are Not credible or have conflict of
interest

Pending the hearing of this motion it is:

ORDERED that [describe what you are asking the court to stay]

(no stay)

~~being alleged~~
Sufficient cause appearing therefore, let personal service of a copy of this order, and
the petition and other papers upon which this order is granted, upon all other parties to this
proceeding or their attorneys, on or before the 16 day of July, 2017 be
deemed good and sufficient. A copy of an affidavit or other proof of service shall be filed with the
County Clerk (Room 141-B) immediately after service and the original thereof shall be presented
to this court on the return date directed in the second paragraph of this order.

ENTER

N.M. B 6/28/17

Any responding papers to be filed with the court and served upon the respondent by
overnight mail service on or before
July 20, 2017

REQUEST FOR JUDICIAL INTERVENTION

UCS-840 (3/2011)

Supreme

COURT, COUNTY OF _____

Index No: 100871/17

Date Index Issued: _____

CAPTION (For the complete case caption, do not use a L.J. One name, if more space is required, attach a caption under sheet, and attach to this application)

Plaintiff(s)/Petitioner(s)
Manah Lopoz **SUPREME COURT**
NEW YORK COUNTY
EX-PARTE MOTION PART **PETITIONER (S)**

Judge for Court Clerk Use Only
6-28-17
Judge Assigned
BANNON
RJI Date
SUPREME COURT
NEW YORK COUNTY
EX-PARTE MOTION PART

-against-

**New York City Department of
 Homeless Services**

RESPONDENTS (S)*NEW YORK CITY DEPARTMENT OF
 HOMELESS SERVICES***Defendant(s)/Respondent(s)****NATURE OF ACTION OR PROCEEDING** (see NOTE under Commercial if applicable)**MATRIMONIAL** (see NOTE under Commercial if applicable)

Tested
 Uncontested

NOTE: For all Matrimonial actions where the parties have children under the age of 18, complete and attach the MATRIMONIAL RJI Addendum.

TORTS

Asbestos
 Breast Implant
 Environmental: _____ (specify)

Medical, Dental, or Podiatric Malpractice

Motor Vehicle

Products Liability: _____ (specify)

Other Negligence: _____ (specify)

Other Professional Malpractice: _____ (specify)

Other Tort: _____ (specify)

OTHER MATTERS

Certificate of Incorporation/Dissolution [see NOTE under Commercial]

Emergency Medical Treatment

Habeas Corpus

Local Court Appeal

Mechanic's Lien

Name Change

Pistol Permit Revocation Hearing

Sale or Finance of Religious/Not-for-Profit Property

Other: _____ (specify)

FILED**JUN 27 2017****NEW YORK
 COUNTY CLERK'S OFFICE**

Business Entity (including corporations, partnerships, LLCs, etc.)

Contract

Insurance (where insurer is a party, except arbitration)

Secs (including sales, negotiable instruments)

Other Commercial: _____ (specify)

NOTE: For Commercial Division assignment requests (22 NYCRR § 202.70(d)), complete and attach the COMMERCIAL DIV RJI Addendum.

REAL PROPERTY (How many properties does the application include?)

Condemnation

Foreclosure

Property Address: _____

Street Address

City

State

Zip

NOTE: For Foreclosure actions involving a one- to four-family, owner-occupied, residential property, or an owner-occupied condominium, complete and attach the FORECLOSURE RJI Addendum.

Tax Certificate - Section: _____ Block: _____ Lot: _____

Other Real Property: _____ (specify)

SPECIAL PROCEEDINGS

CPLR Article 75 (Arbitration) [see NOTE under Commercial]

CPLR Article 78 (Body or Officer)

Election Law

MHL Article 9.60 (Kendra's Law)

MHL Article 10 (Sex Offender Confinement-Initial)

MHL Article 10 (Sex Offender Confinement-Review)

MHL Article 81 (Guardianship)

Other Mental Hygiene: _____ (specify)

Other Special Proceeding: _____ (specify)

Art 75

STATUS OF ACTION OR PROCEEDING: (Answer YES or NO for EVERY question AND enter additional information where indicated)

YES NO

as a summons and complaint or summons w/notice been filed? If yes, date filed: _____

this action/proceeding being filed post-judgment? If yes, judgment date: _____

[Print in black ink all areas in **bold** letters. Other spaces are for Court use.]

EX PARTE MOTION OFFICE

**APPROVED
FOR THE PAYMENT
OF MOTION FEE
ONLY**

At I.A.S. Part _____ of the Supreme Court of the State of New York, held in and for the County of New York at the Courthouse, thereof, 60 Centre Street, New York, N. Y., on the _____ day of _____ 2007/2017

PRESENT: HON. _____
Justice of the Supreme Court

In the Matter of the Application of

Mariah Lopez
[fill in name(s)]

Petitioner(s)

- against -

New York City Dep. of Homeless Services

[fill in name(s)]

Respondent(s)

Index Number

100871/2017

ORDER TO SHOW CAUSE
WITH T.R.O.
IN SPECIAL PROCEEDING

FILED

JUN 28 2017

NEW YORK
COUNTY CLERK'S OFFICE

Upon reading and filing the petition(s) of Mariah Lopez
[your name(s)], sworn to on June 28th, 2007/2017.

[date Verified Petition notarized] and upon the exhibits attached to the petition,

[Identify Exhibits. List additional Exhibits on separate page.]

Exhibit A -

N O FEE

Let the respondent(s) or counsel show cause at I.A.S. Part _____, Room _____, of this Court,
to be held at the Courthouse, 60 Centre Street, New York, N.Y., on the _____ day of
2007 at _____ o'clock in the _____ noon or as soon as the parties to

this proceeding may be heard why an order should not be made, providing the following relief:

[briefly describe what you are asking the Court] Order New York City Dep. Homeless
Services to provide reasonable accommodations for my disability

by placing me in a shelter based on my medical needs and my doctors recommendations, which exclude "dorm" settings,

for the reasons that [briefly describe the reasons why you should be granted what you are requesting] DHS cannot justify refusing to follow my doctors recommendations since DHS are the ones who cited my "mental health" needs, as well as allegations about agressive behavior on my part, as grounds to have me transferred from my last shelter DHS needs to follow the recommendations of my treating psychiatrist and medical Surgeon; both doctors would be against placing me in a dorm

Pending the hearing of this motion it is:

ORDERED that [describe what you are asking the court to stay]

To stay a transferⁱⁿ placement to any facility which goes against the specific recommendation of my current psychiatrist or which does not provide a private room for "medical dilation" as required by my Surgeon's post surgery orders; and

Sufficient cause ~~appearing~~ therefore, let personal service of a copy of this order, and

Respondent

the petition and other papers upon which this order is granted, upon all other parties to this proceeding ~~or their attorneys~~, on or before the _____ day of _____, ~~2017~~ ²⁰¹⁷ be deemed good and sufficient. A copy of an affidavit or other proof of service shall be filed with the County Clerk (Room 141-B) immediately after service and the original thereof shall be presented to this court on the return date directed in the second paragraph of this order.

ORAL ARGUMENT REQUIRED. ENTER

J.S.C.

J. S. C.

[Print in **black** ink to fill in the spaces next to the instructions]

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of

Mariah Lopez
[fill in name(s)]

Petitioner(s)

- against -

NYC Dept. Homeless Services

Index Number

100871/2017

VERIFIED PETITION

[fill in name(s)]

Respondent(s)

TO THE SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK:

The petition of Mariah Lopez [your name] respectfully
shows to this Court as follows:

1. Petitioner resides at Homeless

[your address]

2. The respondent(s) is/are [identify the respondent(s)] NYC Dept. Homeless
Services

3. [Describe what you are requesting. Add more pages if needed. If you are appealing the decision of a government agency, give the date and outcome of the final determination. Explain why this Court should reverse that decision.]

Because DHS is ignoring my doctors just to "prove a point". DHS was allowed by Judge Taffe to transfer me based on arguments made concerning my mental health, my needs. DHS did not speak with my doctors before presenting their case. Even though my lawsuit was dismissed, the letters DHS has from two of my doctors undermine their arguments and support my position that DHS was never transferring me for my own or others

past interest. Their decision was arbitrary and capricious and will cause me irreparable harm.

There were never any ~~hearings~~ (MO)
hearings in this case ~~even~~ in front of Judge Taffe, nor were there fair hearings.

DHS position's are based on un-proven allegations meant to support ~~that~~ ^{the} ~~case~~ my transfer from a specialized facility.

DHS should be forced to prove their allegations with me being able to question witnesses or review evidence.

4. Attached are copies of all relevant documents. [Attach the decision you are asking the court to reverse as Exhibit A. Attach any other documents as Exhibit B, Exhibit C, and so on. List additional Exhibits on separate page.]

Exhibit A - Letter from my Psychiatrist

Exhibit B - Letter from me; addressed to the Court

Exhibit C - DHS refusal of my reasonable accommodation

Exhibit D - Letter from Jennie Cusciano, Expert

Exhibit E -

5. A prior application has not / has [circle one] been made for the relief now requested.

If you made this application before in this or any other court, describe where, when, the result and why you are making it again.]

I made a request to block DHS from transferring me previously. But I now have evidence from my doctors that I can be harmed by DHS transfer. Index No. 100632/2017 was previous Article 78

WHEREFORE, your deponent respectfully requests that this Court [briefly describe what you are requesting]: To stay any Transfer placement to any DHS facility which goes against the specific recommendations of my current Psychiatrist OR which does not provide a private room for my "medical/dilation" needs, as required by my surgeon's post op instructions

JUN 27 2017, 200
[date signed]

Petitioner [sign your name]

Mariyah Lopez
[print your name]

[your address and telephone no.]

VERIFICATION

STATE OF NEW YORK

COUNTY OF New York : ss:

Mariyah Lopez [your name], being duly sworn,

deposes and says that: I am the petitioner in this proceeding; I have read the foregoing petition and know the contents thereof; the same is true to my own knowledge, except as to matters therein stated to be alleged on information and belief; and as to those matters I believe it to be true.

Sworn to before me on

27 day June, 2007
Kenneth Cardez
Notary Public

Petitioner [sign your name in front of a Notary]

Mariyah Lopez
[print your name]

KENNETH CARDEZ
Notary Public, State of New York
Reg. No. 04CA6351839
Qualified in New York County
Commission Expires Dec. 12, 2020

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Mariyah Lopez
[fill in name(s)] Plaintiff(s)/Petitioner(s)
- against -

Index Number
100871/2017UNIFORM RULE SECTION 202.7
AFFIDAVIT OF COMPLIANCE

NYC Dep Homeless Services
[fill in name(s)] Defendant(s)/Respondent(s)

STATE OF NEW YORK
COUNTY OF _____) ss:

Mariyah Lopez, [your name], being duly sworn, deposes and says:
I am the self represented [circle one] plaintiff / defendant in this matter. I make this supplemental
affidavit in support of my Order to Show Cause for a Temporary Restraining Order (TRO).

[Check box that applies]

I have made a good faith effort to notify the party against whom the TRO is sought of the date, time and
place that this request will be made in a manner sufficient to permit the party an opportunity to appear in
response to the application as follows:

On [date] June 26th, 20017, at [time] 45⁰ AM/PM, I contacted by telephone,
the [circle one] plaintiff / plaintiff's attorney / defendant / defendant's attorney / other named below.

TOM RobertsCity Law Department

[name, address, telephone number]

I informed the above named party that on [date and time] _____, 200____, at ____ AM / PM,

I will submit the Order to Show Cause to the [name of Judge] Hon. _____,
located at [circle one] 60 - 80 - 100 - 111 Centre St. / 71 Thomas St., Part _____ [number].

Room _____ [number], [telephone number] (646) 386 - _____.

When informed by the court of the date, time and place the Judge is available to hear argument on
the TRO, I will immediately notify the above named party by telephone.

I have not contacted the party against whom the TRO is sought of the date, time and place this request will
be made. I believe that by giving notice there will be significant prejudice to me for the following reason(s):
[state reasons] _____

Sworn to before me this
27 day of June, 2017

William P. Barcena
Notary Public

WILLIAM P. BARCENA, JR.
Notary Public, State of New York
No. 03BA6195046
Qualified in New York County
Commission Expires 10-20-2020

[sign your name in front of a notary]

Mariyah Lopez
[print your name]

[your address and telephone number]

Sir/Madam:

Please take notice that the within is a (certified) true copy of a
duly entered in the office of the clerk of the
within named court on the _____ day of _____, 200_____

Dated: _____ Yours, etc.
Attorney for: _____ Plaintiff/Petitioner
Defendant/Respondent

Office and Post
Office Address

To: _____
Attorney(s) for _____

*****NOTICE OF SETTLEMENT*****

Sir/Madam:

Please take notice that an _____
of which the within is a true copy will be presented for settlement
to the Hon. _____, one of the Justices
of the within named court at _____, on
_____, 200____ at _____ AM/PM

Dated: _____, 200____ Yours, etc

Plaintiff/Petitioner _____
Defendant/Respondent _____

To: _____
Attorney(s) for _____

INDEX NO. _____

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Mariah Lopez

Plaintiff/Petitioner
- against -

New York City Dep of Homeless
Services Defendant/Respondent

To the best of my knowledge, information and belief,
formed after an inquiry reasonable under the circumstances,
the presentation of these papers or the contentions therein
are not frivolous as defined in subsection (c) of Section
130-1.1 of the Rules of the Chief Administrator (22NYCRR)

Sign Name: Mariah Lopez

Print Name: Mariah Lopez

Address: Homeless

Telephone: 212 470 9687

Service of a copy of the within is hereby admitted

Dated: _____, 200____
Attorney for _____



Cylar House Behavioral Health Clinic
743-748 East 9th St., 2nd Floor
NEW YORK, NY 10009-5334
TEL 212-677-7999 x4202 FAX 212-739-0007
WWW.HOUSINGWORKS.ORG

June 20, 2017

Re: Mariah Lopez

To whom it concerns,

- Ms. Lopez is requesting to return to Marsha's Shelter. She is currently on SSD, due to her PTSD and gender dysphoria. Mariah is highly distressed with her current living situation in a women's shelter, where it is a dormitory-like set-up. She considers this as a harm setting, that being with a cisgender female population inhibits herself to express her own gender identity, causing her more distress, mood changes.
- Presently Ms. Lopez is suffering from active symptoms of PTSD manifested by poor sleep, nightmares, hyper vigilance, volatile moods and being fearful. The location of her shelter is a triggering factor for her PTSD, since she experienced her trauma within the same neighborhood. She reports having flashbacks of traumatic events that she experienced when she was younger in multiple institutions in dormitory settings.

She was provided several alternatives by the City of NY but none of these options are psychologically healthy alternatives for her. Her present living situation has led her to return to prostitution/ being a sex worker, which placed her in a higher distress. Fearing that she could "snap" at her clients due to her instability, I am recommending that Ms. Lopez be transferred back to Marsha's Shelter for her own psychological stability. If this is not an option, this should be an SRO.

All of these stressors clearly makes it difficult for her to comply with her treatment.

Whatever can be done to facilitate and expedite this process would be appreciated.

Sincerely,

Pierre R. Arty, MD
Pierre Arty, MD
Director of Psychiatry
Housing Works
Downtown Brooklyn Health Center
57 Willoughby St

PIERRE RICHARD ARTY, MD
NYS LIC#194382
DEA BA5426502

Exhibit A

Mariah Lopez

June 27, 2017

Dear Judge considering my request for a TRO against DHS,

I am writing this letter as an exhibit to my petition in order to provide context on the situation presented before the court. I am in front of this court today seeking to block DHS from blatantly ignoring the law, and the recommendations of my treating doctors; one a psychiatrist the other a renowned surgeon. DHS has made me homeless over the last few weeks by attempting to force me (by providing no appropriate alternative) in to shelter setters and living conditions which would cause me harm, suffering, and lead to worsening in my medical conditions.

I filed a lawsuit in Federal Court in April, because DHS would not allow my Service Animal into a very specialized shelter for GLBTQ people, where I had been accepted. A Federal Judge ordered them to allow the dog to accompany me into the shelter. DHS retaliated by trying to have me transferred to DHS shelters which ignore my special medical and mental health needs. I filed a previous Special Proceeding to block the transfer to a facility that was actual a trigger for my PTSD itself (I was sexually assaulted blocks from the facility as a child). DHS made objective statements on the record and in filings in the case (in front of Judge Jaffe) regarding my mental health needs driving the transfer, without knowing ANY of my medical needs besides needing a Service Animal. I now have proof that those statements were baseless legal arguments, and not based on my actual needs. The facility DHS is now attempting to place me in is not the facility which Judge Jaffe allowed DHS to transfer me to. DHS, on May 31st, played ^{NO} ^M courts against each other when lawyers for the City and contract agency went before Judge Jaffe first, withholding critical details which they were aware of (including a petition from at least 47 other DHS

Exhibit B

shelter clients who support my allegations of retaliation as witnesses) which may have been a mitigating factor in the judge's decision.

Then, again on May 31st, since I had written to the Judge in the Federal matter, alleging retaliation, DHS and I went in front of Federal Judge Caprioni, where the city lawyers and the lawyers for the contract agency mislead the judge into believing that Judge Jaffe had seen the petition signed by other shelter clients (which would have provided the court with potential proof of the merits of my case and my likelihood of success). DHS also made very specific arguments, which seem to guide the court's decision, which they cannot make anymore, regarding the specific facility WIN West. The Court heard arguments about my potential risk of irreparable harm I may face, but was forced to rule against me since I had no clinical proof of the transfers detriment to my mental health. DHS is now aware of indisputable proof that the transfer is harming me, and that my doctors will not support a transfer to any of the facilities which DHS are telling me to report to.

I am exhausted, and forced to engage in survival sex at night to have somewhere to stay and food to eat. I cannot reside in the shelters DHS is telling me to report to. The accommodations at the facilities do not provide adequate privacy for vaginal dilation, as ordered by my surgeon, and a dorm-style setting is not an option because of my PTSD. DHS has spoken with my psychiatrist and he has expressed this to them.

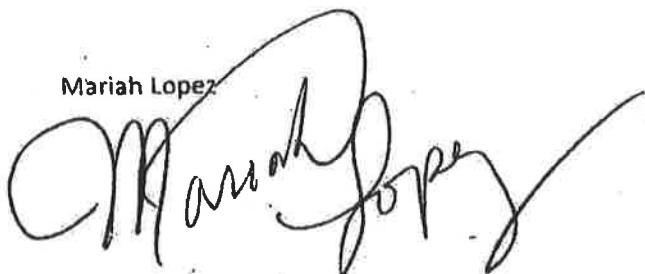
I believe that DHS is simply treating me this way to prove a point; I am no average pro se litigant, as I have successfully won or was lead plaintiff in three landmark cases against New York City (Joel A v Giuliani, Jean Doe v Bell, Lopez v Mattingly). All of these cases literally created the GLBTQ social service system that exists for GLBTQ people throughout NYC, from ACS to Rikers Island and within the Medicaid program. I was virtually raised by attorneys, judges and activists, and so I have been down this road before with the City Law Department. I also helped pass (through testimony and lobbying) the NYC Human Right Law amendment, known as Local Law 3., which expressly prohibits the government from

doing what DHS is doing. That is, attempting to force a Trans person to identify a certain way, in order to avoid mistreatment. There is no way that DHS could stop anti Trans discrimination from taking place within the shelters which I have been told to report to. I am a Transgender women, and, just as in *Joel A v Giuliani*, the City cannot ignore a population (in this case "Trans persons over 30, with special medical needs post-surgery). Likewise, like the case I won called *Jean Doe v Bell*, the City cannot ignore the treatment recommendations for my Gender Identity Disorder. DHS is failing to make "reasonable" accommodations, and is simply trying to treat me as if my conditions don't exist, or, are refusing to make accommodations (like placing me back into the one GLBTQ shelter in the DHS system, or placing me in a SRO or other facility with single person sleeping quarters.) I should not be forced to notify a staff person or a group of dorm mates, when I need to dilate my vagina! Each day I am in the street I risk worsening mental health, the risk of violence in the course of survival sex work, and may be required to have surgery (which comes with a risk of death) to address complications from not being able to follow my surgeon's instructions.

Even though I will be in Federal Court on Friday, I cannot wait, I need this court to act urgently to hold DHS accountable. DHS, including the City Law Department, must respect the recommendations of my surgeon and psychiatrist.

Yours

Mariah Lopez

A handwritten signature in black ink, appearing to read "Mariah Lopez". The signature is fluid and cursive, with a large, stylized "M" at the beginning.



REASONABLE ACCOMMODATION REQUEST DETERMINATION

DATE: June 26, 2017
CLIENT: Mariah Lopez
CARES ID: 745918
CC (Facility Director): Park Slope Women's Shelter

On June 21, 2017, DHS received your request for a reasonable accommodation through the New York City Law Department.

Your request and supporting medical documentation (Letter dated June 20, 2017 from Dr. Pierre Arty, MD) was reviewed by the Program Administrator for Park Slope Women's Shelter, Bill Distefano, in consultation with the DHS Medical Director, Fabienne Laraque, MD.

Based on this review, DHS makes the following determination:

Your request for a reasonable accommodation for a private shelter room and placement at Marsha's House has been denied.

- Private Room: Your request for assignment to an unshared, single unit in a DHS shelter is denied. We understand the need for privacy for dilation and since your dilation needs can be met by accessing as necessary a private room with a locking door in shelter, the request for an unshared room assignment is denied.
- Marsha's House: Your request to reside at Marsha's House is denied as unreasonable due to serious operational and programmatic concerns and the availability of alternative appropriate shelters. Due to prior safety incidents and behavior at Marsha's House, DHS has determined that placing you at Marsha's House would cause an undue burden to DHS as the health and safety of other shelter clients and staff would be at risk. It is further noted that Marsha's House is not a shelter facility solely for transgender clients as it also serves young men and ciswomen, including those who do not identify as Lesbian, Gay, Bisexual, or Questioning. We acknowledge the trauma that you have experienced in the past and understand that, according to your psychiatrist, you suffer from PTSD, and thus we have selected an appropriate shelter with experienced mental health professionals on-site. We also share your psychiatrist's conclusion that your best interests would be served by working diligently toward appropriate permanent housing. DHS and HRA are willing to assist you in obtaining such permanent housing as soon as possible. Attached is a list of HOMEBASE locations where you can access services to assist you with permanent housing options.



Exhibit C

Your request for a reasonable accommodation has been granted.

The Department of Homeless Services offers the following accommodation:

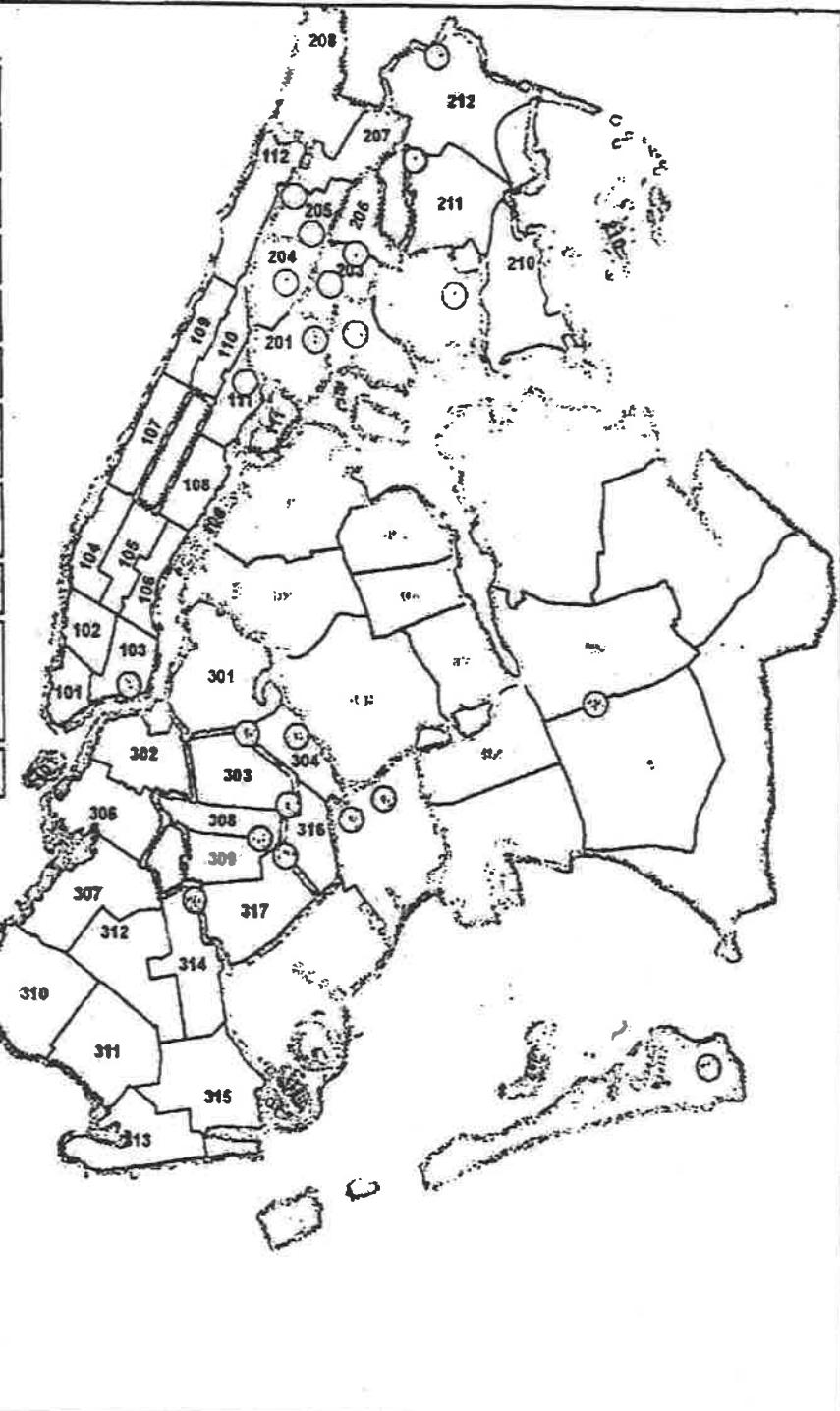
- DHS will accommodate your need for a private room to conduct dilation at the Park Slope Women's Shelter.
- Placement in a women's shelter (Park Slope Women's Shelter), in accordance with your self-reported gender identity, experienced in working with transgender clients.
- Placement at a shelter with on-site mental health services to assist you with a PTSD diagnosis.

You or your representative may appeal this Determination by filing an Appeal within ten (10) business days of receipt of this Determination. Appeals should be directed to the Office of Diversity & Equal Opportunity Affairs Office, 33 Beaver Street, New York, New York 10004 or eoaa@dhs.nyc.gov, and must include:

1. The client's name, address, and telephone number;
2. A description of the program, activity, or service that was denied to client;
3. The date and nature of the alleged denial; and
4. The signature of the client or his/her authorized designee.

Upon request, assistance shall be provided by Client Advocacy to file an Appeal.

Map	Neighborhood	Address (*new office locations)	Telephone	Borough	Community District	Homebase- Provider
1	East Harlem	2276 3rd Avenue	917-492-1019			
2	Lower East Side	265 Henry Street*	917-492-3019	Mn	Manhattan	Palladia Inc
3	Crotone	775 Crotona Park North	718-299-8473			
4	Clarendon	3593 Third Ave (Entrance on 169 St)	917-801-4512	Bx	203, 206	HELP USA I
5	Grand Concourse	1130 Grand Concourse	718-508-3100			
6	Mott Haven	630 Jackson Ave*	718-993-2032	Bx	201, 204	Bronxworks
7	Mount Hope	1780 Grand Concourse, Level 1	347-226-4540			
8	Morris Heights	1981 Sedgwick Ave*	718-215-6453	Bx	205, 207, 208	HELP USA II
9	Unionport	2155 Blackrock Ave	718-414-1050			
10	Hunts Point	890 Garrison Ave*	929-259-9430	Bx	202, 209	ARCHNY I
11	Bronxdale	2901 Whiteplains Road*	347-913-4694			
12	Woodlawn	4377 Bronx Boulevard	347-947-3920	Bx	210, 211, 212	ARCHNY II
13	Crown Heights	1117 Eastern Parkway	718-622-7323			
14	Bedford Stuyvesant	1958 Fulton Street*	718-408-5756 EXT. 37100	Bk	303, 308, 309, 317	CAMBA I
15	Bushwick	90 Beaver Street	718-366-4300		301	
16	Bushwick North	1475 Myrtle Ave	347-295-3738	Bk	304	RBSCC
17	Brownsville	145 East 98th Street	917-819-3200		316	
18	East New York	3060 Fulton Street	929-234-3036		305, 318	CCNS II
19	East New York	560 Livonia Ave*	718-408-7181	Bk		
20	Flatbush	2244 Church Ave	718-408-5766	Bk	302, 306, 307 310, 311, 312 313, 314, 315	CAMBA II
21	Staten Island	120 Stuyvesant Place Suite 413, 4th floor	718-282-6473 EXT. 75007	SI	501, 502, 503	
22	Jamaica	161-10 Jamaica Ave 5th Floor	718-674-1000		401-413	CCNS I
23	Rockaways	1847 Mott Avenue*	718-647-1015	Qns	414	



**Department of
Homeless Services**
www.nyc.gov/dhs

HOME BASE

Homeless Prevention Network

Call 311 for your assigned office location.

Mr. Roberts,

6/22/17

I was recently made aware that Mariah Lopez was facing housing issues and have read her Psychiatrist's letter (attached), your email to her in reference to "reasonable accommodations" and Mariah's response to your email. Quite honestly, I am confused at how the accommodations being offered are reasonable based on the statements made about her PTSD by Dr. Arty. PTSD that I can personally vouch for. I have known Mariah since she was 12 years old. I was her Guardian ad Litem, her counselor and her advocate for the duration of the abuse and mistreatment she faced while in the foster care and group home system. During her childhood and adolescence Ms. Lopez faced countless abuses in the care of ACS. As a human, I was horrified at what she endured before and after we met. Now, many years later as a parent, I think it is shameful for NYC to think there is no need for accountability to a situation that was perpetrated by people who were supposed to protect children.

When I met Mariah, she was in court for running away from her group home. A group home filled with boys who tortured her on a daily basis. The system of care blamed her for behaviors that are symptomatic of abuse, abuse she suffered as a child in a facility in the care of ACS, yet no one wanted to take responsibility or even attempt to fix a broken system so she fought back. She fought the system and won, not just for herself but for all the other LGBT youth who came after her and benefited from a system that she changed (Joel A v Giuliani).

As Mariah continued to be in crisis through her adolescence I connected her with the late Sylvia Rivera, who took her in and helped guide her anger into passion for Trans rights and she continued to fight. She fought to protect Trans people in treatment (Jean Doe v Bell) and again for medical coverage of essential, life changing and transforming procedures for Trans people (Lopez v Mattingly). Yet still, Ms. Lopez is left fighting the system for a stable and safe place to live and this is unacceptable.

I have one last thing to say and I will let this sit with you. When I was 14, I lost my father to HIV. All I heard as a teen was how much more likely I was to contract HIV but I beat those odds and so has Mariah, even though her odds were so much greater than mine. No one can say she doesn't care about her health or life because if that was the case she would most likely with all her precursors, be HIV+ by now yet she is not. Mariah is the most resilient person I know but she has been fighting the system her whole life and at some point someone needs to step in and say ENOUGH. I am imploring you to help Mariah, to do something to assist someone who has spent her life, her time and far too many times her last dime to help others.

Exhibit D

Sincerely,

Jennie Blakney, MA.Ed

Coordinator, Health Projects 3

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57 Willoughby St, 2nd Floor, Brooklyn, NY 11201 www.HOUSINGWORKS.ORG

June 29, 2017

Re: Mariah Lopez

To whom it may concern:

My patient, Ms. Lopez, a transgender woman, requires a housing situation that allows her complete privacy and agency to dilate her neovagina, due to a vaginoplasty performed in 2009. It is essential that she be able to choose when and where she dilate, as it requires her to focus on erotic thoughts to increase blood flow and decrease pain. She has reported emotional distress to having to ask permission to dilate. If she is forced to ask DHS shelter staff to access a room for dilation, her medical confidentiality is compromised as she must carry medical equipment with her. Furthermore, if she cannot dilate in a safe and comfortable place at her will, she may develop vaginal stenosis that requires treatment by narcotic pain medication to dilate per her surgeon, increasing risk of dependency.

If Ms. Lopez is not able to dilate her neovagina regularly (three times a day for 15 minutes as prescribed by her surgeon), she will have to undergo additional surgery that will put her at risk of complication and serious infection that puts her at risk of mortality. It is imperative that she be moved to a shelter that can fully accommodate her needs.

Ms. Lopez has been under my care since 2016. She has expressed concern about access to safe spaces to dilate to preserve vaginal depth since our first meeting. As her medical provider, I'm aware of the Reasonable Accommodation request made by Ms. Lopez to DHS which was denied. I can consider her medical needs urgent, and any placement in a dorm setting inappropriate and not a reasonable accommodation. Furthermore, from a Women's Health perspective, a woman should not have to seek permission from a governmental agent to care appropriately for her body, which is what the accommodation outlines per DHS. If you have any questions or concerns, please feel free to contact me.

Sincerely,


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